

# Summer Food Service Program

## Sponsor Training Part 3: Administering the Program



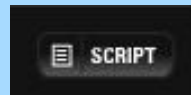
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# SFSP Sponsor Training Part 3: Administering the Program

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headsets to the desired level before continuing.**



**To read the script with the narration, click on the  
“script” icon in the lower right-hand corner.**



# Helpful Information

- **2016 SFSP Administrative Guidance Manual and attachments**
- **2016 SFSP Monitor's Guide**
- **Training PowerPoint**

# Training Topics

- **Application Requirements**
- **Training**
- **Civil Rights**
- **Claims for Reimbursement**
- **Recordkeeping**
- **Administrative Review**
- **Appeals**

# Application Requirements

- ✓ New potential sponsors must submit an application before the June 15 deadline.
- ✓ Notification of approval or denial will be issued within 30 days of TDHS receiving a completed application.
- ✓ Once an initial application has been approved, more limited annual updates to the application will be required.



**Incomplete applications will cause a delay in application approval.**

# Application Requirements

- ✓ **Submit documentation of tax-exempt status.**
- ✓ **Demonstrate adequate administrative and financial responsibility to manage an effective food service.**
- ✓ **Provide a site information sheet for each proposed site.**

# Application Requirements

- ✓ For enrolled sites, provide a written policy statement on free meals.
- ✓ Camps that charge separately for meals also must explain that the camp uses USDA's eligibility standards for family size and income levels at the level of reduced-price school meals.
- ✓ Provide a copy of a proposed media release.

# Application Requirements

- ✓ **Submit a complete management plan that includes staffing needs and an administrative budget.**
- ✓ **Apply for advance payments, if needed.**
- ✓ **Certify that a training program will be conducted for monitors and site personnel.**



# Application Requirements

- ✓ For sponsors that plan to use a food service management company to provide meals, provide a copy of the invitation for bid;
- ✓ For sponsors that plan to use a school food authority to provide meals, provide the proposed agreement.
- ✓ If the sponsor is a governmental entity or a private nonprofit organization, certify that the sponsor will have direct operational control at each site.

# State-Sponsor Agreement

- Sponsors must enter into a permanent agreement with the State agency.
- The agreement is a legally binding document that specifies the rights and responsibilities of both the sponsor and State agency, and should be read carefully before being signed.



Describing the agreement as “permanent” means that the agreement has no predetermined expiration date.

# **Contracting with a Food Service Management Company**

- **Meal ordering;**
- **Assuming official recordkeeping responsibilities, including meal count;**
- **Information to substantiate claims;**
- **Submitting claims;**
- **Training and monitoring administrative and site staff;**
- **Announcing availability of meals to the news media;**
- **Determining income eligibility and maintaining individual income eligibility statements.**
- **Enforcing corrective action;**
- **Preparing Program applications.**

# Training

- ✓ **Sponsors are required to hold Program training sessions for its administrative and site personnel.**
- ✓ **A site may not operate until personnel have attended at least one of the training session.**
- ✓ **Sponsors should provide training throughout the summer.**



**Each meal site must have at least one person present that has received training.**

# Training (Administrative Personnel)

- **Basic program information**
- **How the program will operate**
- **Specific duties of monitors**

# Training (Site Personnel)

## Basic for all:

- Meal pattern requirements, menu
- Point of service meal counting/recordkeeping
- Nondiscrimination policy
- Use of leftover food
- Sanitation and food safety issues
- Site monitoring

# **Training (Documentation)**

- **Date(s) of training for site and administrative personnel.**
- **Attendance at each training session by having all attendees sign an attendance form.**
- **Topics covered at each training session.**

# Civil Rights Requirements

- **Civil Rights Training**
- **Nondiscrimination Statement**
- **Racial/Ethnic Data Form**



# **Collecting and Recording Participation Data**

**Every sponsor must collect racial and ethnic data on an annual basis.**

- **Sources for obtaining such data includes census data or public school enrollment data.**

**Sponsors of residential camps must collect and maintain this information separately for each session of the camp.**

**For all other sites, the sponsor must count the participating children at least once during the site's operation.**

# **Obtain Racial/Ethnic Data**

**Census data or public school enrollment data.**

- **Used to determine the number of POTENTIALLY eligible beneficiaries.**

**Visual identification to determine a participant's ethnic/racial category.**

- **Used for collect ACTUAL beneficiary data.**

# Data Collecting and Reporting

- ✓ **Separate categories must be used when collecting and reporting race and ethnicity.**
- ✓ **Ethnicity must be collected first.**
- ✓ **Respondents must be offered the option of selecting one or more racial designations.**

# Data Collecting and Reporting

The minimum designations for collection are:

✓ **Ethnicity Categories**

- **Hispanic or Latino**
- **Non-Hispanic or Non-Latino**

✓ **Racial Categories**

- **American Indian or Alaskan Native**
- **Asian**
- **Black or African American**
- **Native Hawaiian or other Pacific Islander**
- **White**



The sponsor must retain data, as well as documentation for the data, for the required five years.

# Civil Rights Requirements (Public Notification)

- **Media Release:** Must be completed prior to program operation.
- ***And Justice for All . . .* poster:** Each site must have a full size poster on display.
- **Translation:** Make reasonable efforts to provide information in the appropriate translation concerning the availability and nutritional benefits of the program.

# **Civil Rights Requirements (Non-Discrimination)**

- ✓ **Ensure that meals are served to all attending children, regardless of their race, color, national origin, sex, age, or disability.**
- ✓ **Ensure that all children have equal access to services and facilities at the site regardless of race, color, national origin, sex, age or disability.**

# **Claims for Reimbursement (Deadlines)**

- ✓ **If there are 10 days or less of operation within a given month; that month can be combined with the prior or following month**
- ✓ **If there are less than 10 operating days in the final month of operation; that final month **MUST** be combined with the prior month.**

# Claims for Reimbursement

- **Certify that the claim is correct and that records are available to support this claim.**
- **Failure to maintain such records may be grounds for denial for reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question.**
- **The cost of meals served to adults performing necessary food service labor may be included in the claim (administrative expenses).**
- **Under no circumstances may a sponsor claim the cost of any disallowed meals as operating costs.**



# Claims for Reimbursement

- **The Sponsor cannot claim reimbursement for meals served to children at any site in excess of the site's approved level of meal service.**
- **Second meals must be limited to 2% of the first meals served.**
- **Second meals should only be served after all participating children at the site have been served a meal.**

# Claims for Reimbursement

- **Postmarked and/or submitted no later than 30 days after the last day of the month covered by the claim.**
- **Reimbursements will not be paid for meals served before the sponsor has received written notification of approval.**
- **Meals tested for bacteria levels or temperature and not served to participating children are allowable OPERATING COST, but they MAY NOT be claimed for reimbursement.**



**Meal counts should include only meals served not meals prepared.**

# Recordkeeping

- Failure to maintain such records may be grounds for denial of reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question.
- The Sponsors records must be available at all times for inspection and audit by representatives of the Secretary, the Comptroller General of the United States and the state agency for a period of three years following the date of submission of the final claim for reimbursement for the fiscal year.

# Recordkeeping

**To justify claims for reimbursement, sponsors must maintain the following records:**

- **Point of service meal counts taken daily at each site;**
- **Program operating costs, including food receipts, and other costs;**
- **Program administrative costs, including labor and supplies;**
- **Funds accruing to the program.**

# Recordkeeping

## Tracking Funds

- Sponsors must be able to account for the receipt, obligation, and expenditure of all SFSP funds.
- This does not mean that sponsors are necessarily required to maintain Summer Food Service Program funds in a separate bank account from other institution expenditures.
- Sponsors must ensure that all Summer Food Service Program reimbursements are being used solely for conducting nonprofit food service operations.

# Recordkeeping

- ✓ **Non-program and program components of the food service operation must be tracked separately.**
- ✓ **Ensure that the SFSP nonprofit food service program component does not support any non-program food service activities.**

# **Recordkeeping (Daily Meal Counts)**

## **Sponsors must:**

- ✓ **Use daily site records in order to document the number of program meals they have served to children;**
- ✓ **Provide all necessary record sheets to the sites;**
  - **Site supervisors are then responsible for keeping the records each day.**

## **Site personnel must:**

- ✓ **Complete the records based on actual counts taken at each site for each meal service on each day of operation;**
- ✓ **Be sure that they record all required counts at the time of meal service.**

# Records and Claims (Daily Meal Counts)

These counts should include the number of:

- Meals delivered or prepared, by type;
- Complete first meals served to children, by type;
- Complete second meals served to children, by type.
- Excess meals or meals leftover;
- Non-reimbursable meals;
- Meals served to program adults, if any;
- Meals served to non-program adults, if any.



All final claims must be submitted to the state agency within 30 days following the last day of the month covered by the claim.



# Recordkeeping

## Field Trips

- **Must be documented at sponsor level in order for meals to be claimed.**

## Expenditures

- **Operational Records (food, food service labor, non-food supplies, utilities, etc.)**
- **Administrative Records (admin labor, supplies, utilities, etc.)**
- **Operational and Administrative expenses do not have to be separated out but must be on file to support total expenses for the Program.**

# Recordkeeping

## Training

- **Training must be documented annually.**

## Receipts and invoices

- **Primary expense documentation must be on file.**

# Income to the Program

- ✓ **Must be retained and used for the sole purpose of operating a nonprofit food service.**
- ✓ **Limited to allocating costs to the program for allowable expenses of serving meals to eligible participants.**

# **Income to the Program (Excess Funds)**

- ✓ **Certify whether or not excess SFSP funds exist.**
- ✓ **Use the funds for allowable SFSP expenses.**
- ✓ **Use funds for other Child Nutrition Programs.**
- ✓ **Remit excess funds to the state agency.**

# Administrative Reviews

- **Visits by State Agency and/or USDA personnel to site and office.**
- **Designed to ensure the program is operating in accordance to requirements.**

# How Does an Administrative Review Work?

- ✓ **Completed by State agency.**
  - **External Program Review does this through monitoring.**
- ✓ **Review of meal service operations and recordkeeping at site.**
- ✓ **Results may affect the amount of reimbursement a sponsor will receive.**
- ✓ **Can be announced or unannounced.**

# Violations

**Program violations include but are not limited to:**

- **Failure to maintain adequate site or sponsor records;**
- **Failure to adjust meal orders to conform to changes in site attendance;**
- **Failure to have a trained site supervisor at each site during the meal service;**
- **Serving more than one meal to a child at one time;**
- **Children eating complete meals off-site;**
- **Claiming meals that were not served to eligible children;**
- **Serving meals or offering meals that do not include all required meal components and/or correct quantities.**

# **What is a Serious Deficiency?**

**Serious program violation or issues of noncompliance with SFSP requirements that is determined from the findings of the monitoring report.**

## **Notice of Serious Deficiency**

- **Corrective Action Plan**
- **Revised Claim(s)**



# Corrective Action Plan

- ✓ **When the State agency finds violations during a site review, it will require the sponsor to correct the problems found.**
- ✓ **The State agency will initiate a follow-up system to ensure that sponsors take the specific action for correcting site violations.**

# Appeal Rights

- Denial of request for an advance payment.
- Denial of a claim for reimbursement.
- Termination of participation in the Program.
- Denial of site application.
- Denial of a FSMC's application or revocation of registration.
- Claim against a sponsor for remittance of a payment.
- Refusal by the State agency to forward to FNS an exception request by the sponsor for payment of a late claim or a request for an upward adjustment to a claim

# How Can an Appeal be filed?

**Must be in writing (within 10 calendar days)**

- **Mail**

**Tennessee Department of Human Services  
Appeals and Hearings Division, Clerk's Office  
P.O. Box 198996  
Nashville, TN 37219-8996**

- **Fax**

**(866) 355-6136**

- **E-mail**

**AppealsClerksOffice.DHS@tn.gov**

# Reminders

- 1. All sponsors are required to submit an initial program application to TDHS before the June 15 deadline.**
- 2. Sponsors are required to annually train all of their SFSP staff.**
- 3. Sponsors must agree to operate the Program or facility in compliance with Civil Rights laws.**
- 4. Sponsors assume complete responsibility for all of the information they submit on their claims.**

# Reminders

- 5. Sponsors must maintain accurate records which justify all costs and meals claimed.**
- 6. Administrative reviews are designed to ensure that a sponsor's overall program is operating according to requirements.**
- 7. Any sponsor denied participation in the program or denied program payment has the right to appeal.**

# Thank You!

# SFSP Assessment & Evaluation

**Credit for this training is determined by your completion of the assessment.**



**[Click here](#) to take the assessment.**

**Completing the training assessment is mandatory!**